

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 3:20-CR-061
)	
RUBEN JAVIER CAC-CHON,)	
)	
Defendant.)	

STATEMENT OF FACTS

The parties stipulate that the allegations in Count One of the Indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. On an unknown date and at an unknown location, defendant RUBEN JAVIER CAC-CHON, at all times a citizen of Guatemala, first made illegal entry into the United States without inspection or admission by an immigration official.

2. On August 24, 2013, CAC-CHON was encountered by officers of the Department of Homeland Security's Bureau of Immigration and Customs Enforcement in Richmond, Virginia.

3. On August 29, 2013, CAC-CHON was issued a Notice to Appear I-862, alleging that he was in violation of section 212(a)(6)(A)(i) of the Immigration and Nationality Act in that he entered the United States without Inspection.

4. On August 25, 2014, an immigration judge in Arlington, Virginia granted CAC-CHON voluntary departure to Guatemala. On September 25, 2014, CAC-CHON voluntarily departed the United States to Guatemala.

5. On a date after September 25, 2014, CAC-CHON again illegally entered the United States at an unknown location and on an unknown date without inspection or admission by an immigration official.

6. On June 28, 2019, CAC-CHON was encountered by officers of the Department of Homeland Security's Bureau of Immigration and Customs Enforcement in Chesterfield, Virginia

7. On July 25, 2019, CAC-CHON was issued a Notice to Appear I-862, alleging that he was in violation of section 212(a)(6)(A)(i) of the Immigration and Nationality Act in that he entered the United States without Inspection.

8. On September 10, 2019, an immigration judge in Arlington, Virginia ordered CAC-CHON removed from the United States to Guatemala. On September 25, 2019, CAC-CHON was removed from the United States to Guatemala.

9. On a date after September 25, 2019, CAC-CHON reentered the United States at an unknown location and on an unknown date without advance permission of the Attorney General of the United States or the Secretary of Homeland Security.

12. On May 15, 2020, CAC-CHON was encountered by officers of the Department of Homeland Security's Bureau of Immigration and Customs Enforcement in Richmond, Virginia.

13. The defendant did knowingly and unlawfully reenter the United States, after having been previously removed, without advance permission of the Attorney General of the United States or the Secretary of Homeland Security, in violation of Title 8, United States Code, Sections 1326(a).

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: Heather H Mansfield
Heather Hart Mansfield
Assistant United States Attorney

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

Ruben Javier Cac-Chon
Ruben Javier Cac-Chon
Defendant

I am the defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

Joseph Camden
Joseph Camden, Esquire
Attorney for Ruben Javier Cac-Chon